

# **EXHIBIT B**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

E. JEAN CARROLL, )  
Plaintiff, )  
-against- ) 20-cv-7311 (LAK)  
DONALD J. TRUMP, in his )  
personal capacity, )  
Defendant. )  
\_\_\_\_\_ )

\*\*\*CONFIDENTIAL\*\*\*

VIDEOTAPED DEPOSITION OF  
E. JEAN CARROLL  
New York, New York  
Friday, October 14, 2022

Reported By:  
CATHI IRISH, RPR, CRR, CLVS

1 CARROLL - CONFIDENTIAL

2 you bought the dress with?

3 A. Marcia Pinkstaff, Renata Joy,  
4 J-O-Y, Marcia Pinkstaff.

5 Q. Could you spell that?

6 A. Marcia, C-I-A, and Pinkstaff,  
7 P-I-N-K-S-T-A-F-F.

8 Q. Do you still communicate with  
9 these two friends?

10 A. Renata, I get her newsletter, and  
11 I haven't talked to Marcia for a while.

12 Q. When is the last time you spoke  
13 to Renata?

14 A. Oh, 10 years maybe.

15 Q. And Marcia?

16 A. 15, 20.

17 Q. Do you know where they live?

18 A. I think they are both in  
19 New York.

20 Q. Last question, do you keep track  
21 of how many letters you get from your  
22 readers at Elle?

23 A. I never did until -- until this  
24 happened, until the lawsuit happened.

25 Q. When was that, 2019?

1 CARROLL - CONFIDENTIAL

2 A. Yeah. Before that, I would  
3 delete. You know, after that I deleted  
4 nothing and so --

5 Q. So now you keep track meaning you  
6 keep count or you just keep them?

7 A. I don't delete anything anymore.

8 Q. Do you keep count of your letters  
9 that you receive?

10 A. Yes.

11 Q. And where do you keep count of  
12 them?

13 A. Oh, in Gmail.

14 Q. In Gmail. So you don't have a  
15 spreadsheet that keeps track?

16 A. No, no, I can just go through and  
17 say January and just count the number of  
18 Ask E. Jean letters.

19 MS. HABBA: All right.

20 MS. KAPLAN: Let me just correct  
21 the record. The document that we  
22 introduced should have been, because I  
23 have no idea what side of the case I'm  
24 on anymore, it should be Plaintiff's  
25 Exhibit 1 and the exhibits you